

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

15 CV 7175 (KAM)

- against -

MARTIN SHKRELI,
EVAN GREEBEL,
MSMB CAPITAL MANAGEMENT LLC and
MSMB HEALTHCARE MANAGEMENT LLC,

Defendants.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Government's Memorandum of Law in Support of Application To Intervene and To Stay Civil Proceedings, the United States will move this Court on a date and time to be designated by the Court, before the Honorable Kiyo Matsumoto, at the United States Federal Courthouse, 225 Cadman Plaza, Brooklyn, New York 11201, pursuant to Rule 24 of the Federal Rules of Civil Procedure, for intervention for the purpose of seeking a stay of civil proceedings and for such other relief as the Court deems appropriate.

Dated: Brooklyn, New York
January 25, 2016

Respectfully submitted,

ROBERT L. CAPERS
United States Attorney

/s/

Winston M. Paes
Alixandra E. Smith
Assistant U.S. Attorneys
(718) 254-6023 (Paes)

Cc: Clerk of the Court (KAM)
All Counsel (By ECF)